## UNITED STATES DISTRICT COURT FOR THE MIDDDLE DISTRICT OF PENNSYLVANIA

RUSSEL "JOEY" JENNINGS, : RINALDO SCRUCI, ROBERT B. : CARSON, LAUREN LOTZI, BETH : LAMBO, MARIA KASHATUS, DAVID :

NAULTY, MAUREEN JORDA, JANINE

WINSOCK, CYNTHIA MARTIN, : No. 3:20-CV-0148

TERRY D. HETRICK, SHARON : MCCABE, and VIOLA "VIANNE" :

CAYE, :

Plaintiffs : Judge Mannion

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v. : Electronically Filed Document

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TOM WOLF, TERESA D. MILLER, : Complaint Filed 01/29/20

KRISTIN AHRENS, SUE RODGERS, :

MARK J. GEORGETTI,

PENNSYLVANIA DEPARTMENT OF
HUMAN SERVICES, PENNSYLVANIA
OFFICE OF DEVELOPMENT
PROGRAMS, POLK CENTER, and
WHITE HAVEN CENTER,

**Defendants**:

## PLAINTIFFS' FIRST MOTION FOR EXTENSION OF TIME TO SERVE RESPONSES AND OBJECTIONS TO "DEFENDANTS' FIRST SET OF INTERROGATORIESAND REQUESTS FOR PRODUCTION OF DOCUMENTS"

And now, come the Plaintiffs, by their attorney, Thomas B. York, and file this request for an extension of time to serve responses and objections to "Defendants' First Set of Interrogatories and Requests for Production of Documents" (hereinafter referred to as "Defendants' discovery"), and aver the following:

1. The Defendants' discovery was served on April 1, 2022. The Plaintiffs' responses and objections to Defendants' discovery are due on May 1, 2022.

2. The Defendants' discovery includes 47 items, not even counting subparts, and which requires substantial time to respond and object to. There has not yet been any agreement of the parties to exceed the limitation of twenty-five (25) interrogatories, although Plaintiffs' counsel is willing to consider a greater number and has so advised Defendants' counsel.

Fed.R.Civ.P. 33(a)(1). The Plaintiffs' counsel has been very busy coordinating the completion of expert reports by Plaintiffs' expert witnesses which are due May 9, along with many other legal tasks in this and other cases. The Plaintiffs' counsel believes that just five (5) additional

3. An email was sent by Plaintiffs' counsel to Defendants' counsel on the morning of April 29 requesting additional time to complete responses and objections, but Defendants' counsel has not yet responded to this request.

days will allow him to complete appropriate responses and objections.

4. This extension is sought in good faith and will not prejudice the Defendants.
WHEREFORE, the Plaintiffs respectfully request an extension of time until May 6, 2022,
to serve their responses and objections to Defendants' discovery.

Respectfully submitted,

/s/ Thomas B. York THOMAS B. YORK 1205 Argus Road Kill Devil Hills, NC 27948 (717) 495-4555 tyork@yorklaw.us

**Counsel for Plaintiffs** 

May 1, 2022

## **CERTIFICATE OF SERVICE**

I, Thomas B. York, hereby certify that on May 1, 2022, I served a true and correct copy of PLAINTIFFS' FIRST MOTION FOR EXTENSION OF TIME TO SERVE RESPONSES AND OBJECTIONS TO "DEFENDANTS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS," through electronic filing, on the following:

Nicole Boland Senior Deputy Attorney General Office of Attorney General 15<sup>th</sup> Floor, Strawberry Square Harrisburg, PA 17120

/s/ Thomas B. York
THOMAS B. YORK

## **CERTIFICATE OF NON-CONCURRENCE**

I, Thomas B. York, hereby certify that I sent an email to Defendants' counsel on the morning of April 29, 2022, requesting additional time to serve responses and objections to Defendants' discovery, but Defendants' counsel has not yet responded.

<u>/s/ Thomas B. York</u> THOMAS B. YORK